

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

JANE DOES 1-6, JOHN DOES 1-3, JACK
DOES 1-1000, JOAN DOES, 1-1000,

Plaintiffs,

v.

JANET T. MILLS, in her official capacity as
Governor of the State of Maine, et al.

Defendants.

CIVIL ACTION

Docket No: 1:21-cv-00242

**RESPONSE OF DEFENDANTS MAINEHEALTH, GENESIS HEALTHCARE OF
MAINE, LLC, GENESIS HEALTHCARE, LLC, AND MAINEGENERAL HEALTH TO
NEWS MEDIA MOTION TO INTERVENE**

Defendants MaineHealth, Genesis Healthcare of Maine, LLC, Genesis Healthcare, LLC,
and MaineGeneral Health (“Defendants” or “Provider Defendants”), through counsel, hereby
respond to MTM Acquisition, Inc.’s Motion to Intervene.

Defendants join Defendant Northern Light Foundation in taking no position with respect
to the News Media Motion to Intervene. Defendants do not intend to waive, and hereby
expressly reserve, the right to be heard on any other matters that may arise in connection with the
Court’s ruling on that Motion, including any appeal therefrom, as well as MTM Acquisition’s
participation in this case as an Intervenor in the event the Court allows it.

Dated: December 3, 2021

/s/ James R. Erwin

James R. Erwin

/s/ Katharine I. Rand

Katharine I. Rand

Pierce Atwood LLP

254 Commercial Street

Portland, ME 04101

207-791-1100

jerwin@pierceatwood.com

krand@pierceatwood.com

Counsel for Defendants

MaineHealth, Genesis Healthcare of Maine, LLC,

Genesis Healthcare, LLC and MaineGeneral Health

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MAINE**

CERTIFICATE OF SERVICE

I hereby certify that on December 3, 2021, I served Defendants' Response of Defendants MaineHealth, Genesis Healthcare of Maine, LLC, Genesis Healthcare, LLC, and MaineGeneral Health to News Media Motion to Intervene with the Clerk of Court using the CM/ECF System, which will send notification of such filing(s) to counsel of record:

Dated: December 3, 2021

/s/ James R. Erwin

James R. Erwin

Pierce Atwood LLP

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Portland, ME 04101

207-791-1100

jerwin@pierceatwood.com

Counsel for Defendants

*MaineHealth, Genesis Healthcare of Maine,
LLC, Genesis Healthcare, LLC and
MaineGeneral Health*